

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on November 1, 2013.

Permit Number: **R30-01100007-2013**

Application Received: **October 6, 2015**

Plant Identification Number: **03-54-011-00007**

Permittee: **Huntington Alloys Corporation**

Mailing Address: **3200 Riverside Drive, Huntington, WV 25705**

Permit Action Number: *MM04*      Revised: *April 25, 2016*

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Physical Location:	Huntington, Cabell County, West Virginia
UTM Coordinates:	379.2 km Easting • 4252.30 km Northing • Zone 17
Directions:	Interstate 64W to 29th Street Exit, go towards Huntington on Route 60 to the Washington Blvd intersection. Make a right and go across Washington Blvd bridge. Right turn on Riverside Drive. Enter plant through Main Gate.

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### Facility Description

Huntington Alloys Corporation is a large rolling mill devoted exclusively to the production of wrought nickel and high nickel alloy products utilizing melting and remelting of metals to produce alloy ingots, hot and cold rolling, forging, drawing, machining, grinding, shot blasting, pickling, annealing, and ancillary testing and by-product recovery operations.

### Proposed Modification

The permittee proposes to install a Viking Belt Blaster (Emission Unit: TP-19-P).

## Emissions Summary

The proposed changes will result in the following changes in emissions:

Pollutant	Change in PTE ( $\pm$ tpy)
PM/PM10	+0.19
HAPs	+0.01

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 182.56 tons per year of CO, 636.89 tons per year of NO<sub>x</sub>, 1,093.95 tons per year of PM<sub>10</sub>, 190.78 tons per year of nickel, 56.01 tons per year of chromium, 20 tons per year of hydrochloric acid, and 272.77 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Huntington Alloys Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Particulate Matter limits
	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2532I	February 25, 2015	

*R13-2532H – was for the Installation on the Viking Belt Blaster.*

*R13-2532I – was for correcting the control device of the Viking Belt Blaster.*

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website

## **Determinations and Justifications**

The following changes were made to incorporate changes made to R13-2532H and R13-2532I.

### Section 1.0

- Updated the Year Installed for Emission Unit TP-10-P. Huntington Alloys submitted a request for a Permit Determination on August 24, 2015 for replacement of the shot blaster, Emission Unit TP-10-P. As shown in PD15-075, no permit was required for the change. The new Wheelabrator 34 shot blaster is subject to the same requirements as the old Pangborne GN34 shot blaster, therefore the only Title V permit change was to update the installation date.
- Added the Viking Belt Blaster (Emission Unit: TP-19-P) to the Emission Unit Table.
- Updated the active permits table.

### Section 13.0 Thistle Processing, LLC Requirements

- Added TP-19-P to the emission unit list in the section title.
- Updated condition 13.1.1. to include the Viking Belt Blaster, source TP-19-P, and its PM limits.
- The new Viking Belt Blaster (TP-19-P) is subject to 45CSR§7-4.1. The requirements of 45CSR§7-4.1 are streamlined with condition 13.1.1 and compliance is shown by meeting the hourly PM limit.
- Updated condition 13.1.2. to include the Viking Belt Blaster source along with its specified parameter limits.
- Added the Viking Belt Blaster to condition 13.1.4 and updated the citation to include condition 4.1.5.
- The new Viking Belt Blaster is subject to the opacity limit of 45CSR§7-3.1 which is contained in existing condition 13.1.5.
- The following conditions required updates to their citations due to numbering changes in R13-2532H: 13.1.1, 13.1.5, 13.1.6, 13.1.7, and 13.1.8.

### Section 14.0 Recycled Scrap Metal Requirements

- Added TP-19-P to the emission unit list in the section title.
- Added condition 14.1.24 which contains the PM & HAP emission limits for the Viking Belt Blaster (TP-19-P).

## **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

## **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: Not Applicable for minor modifications.  
Ending Date: N/A

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478  
Robert.A.Mulins@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.